



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

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December 22, 2008

Ms. Deborah Jordan
Director, Air Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, California 94105

Subject: Request to be designated the Primary Quality Assurance Organization
for California's Great Basin Valleys Air Basin

Dear Ms. Jordan:

The Great Basin Unified Air Pollution Control District (GBUAPCD) requests that U.S. Environmental Protection Agency (EPA) recognize the GBUAPCD as a Primary Quality Assurance Organization (PQAO) for reporting to EPA's National Air Quality Data System (AQS). The GBUAPCD is the local government agency made up of Alpine, Mono and Inyo Counties that regulates air quality throughout the entire Great Basin Valleys Air Basin in Eastern California. This step would allow the GBUAPCD to work directly with the EPA to ensure the highest quality data is collected and reported to the AQS in a timely manner.

It may be uncommon for a medium-sized, rural district, like the GBUAPCD, to be designated as a PQAO. However, EPA Region 9's August 2008 Technical System Audit (TSA) of the California Air Resources Board (ARB), which included an audit of the GBUAPCD's monitoring and reporting program, gave the GBUAPCD very high marks and concluded that the district "operates an independent monitoring, laboratory and QA [Quality Assurance] program from that of ARB" and "GBUAPCD should be considered an independent QA organization, separate and distinct from the ARB, for purposes of annual data summary, statistical evaluation and comparison to the NAAQS."

The GBUAPCD agrees to meet the five criteria listed below as the key criteria to be used when an agency decides that its sites should be considered as a PQAO. These include:

1. Operation by a common team of field operators according to a common set of procedures – All District field technicians use a common set of Standard Operation Procedures (SOPs) that were written by the District and reviewed by the EPA during the recent TSA.
2. Use of a common Quality Assurance Project Plan (QAPP) – As noted in the EPA's TSA, the District has independent QAPPs for its PM_{2.5} and PM₁₀ monitoring programs and laboratory operations. The QAPPs incorporate the SOPs written by the District.

3. Common calibration facilities and standards – The District has staff devoted exclusively to QA activities, including routine calibration of monitoring and laboratory equipment.
4. Oversight by a common quality assurance organization – The District's QA-devoted staff conduct all QA activities according to the QAPPs.
5. Support by a common management, laboratory or headquarters – All air quality monitoring activities are managed by the District's Air Monitoring Specialist with assistance from the Air Pollution Control Officer (APCO) and Deputy APCO. All laboratory operations take place in the District's Bishop laboratory facility.

As mentioned above, EPA Region 9's recent TSA concluded that the GBUAPCD is currently operating an independent monitoring, laboratory and QA program that meets or exceeds all EPA requirements. If EPA designates the GBUAPCD as a PQAQO, the District will continue to prepare and file an annual Ambient Air Monitoring network Plan and will notify the EPA Region 9 Quality Assurance Office of all network modifications and site changes. The GBUAPCD agrees to continue to provide the current level of training, education, operation, QA and data management/reporting as is currently in place. District staff will continue to enter all criteria air pollution data and QA data into the AQS system. The District will also maintain the existing public access to its air quality and meteorological data network through its website (www.gbuapcd.org/data).

The GBUAPCD understands that, if it is designated a PQAQO, EPA Region 9 will conduct system audits every three years, conduct performance audits twice each year, and provide all other support and/or quality assessments as designated in Title 40 of the Code of Federal Regulations Part 58.

EPA's designation of the GBUAPCD as a PQAQO will maximize the use of existing resources while ensuring that the highest quality data continues to be collected and reported to the AQS in a timely manner.

We look forward to continuing to work with the EPA on this and other mutually beneficial projects. Please contact me if you have any questions or need additional information.

Sincerely,

Theodore D. Schade
Air Pollution Control Officer

Copies: Sean Hogan, EPA Region 9
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